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and through the Oregon State Treasurer on behalf of the Common
School Fund and, together with the Oregon Public Employees
Retirement Board, on behalf of the Oregon Public Employees
Retirement Fund and Oklahoma Teachers Retirement System and
Proposed Co-Lead Counsel for the Class*

[Add'l counsel listed following signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALLAN J. NICOLOW, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

HEWLETT-PACKARD COMPANY, LEO
APOTHEKER, MARGARET C.
WHITMAN, CATHERINE A. LESJAK, and
JAMES T. MURRIN,

Defendants.

Case No. CV-12-05980 CRB

**DECLARATION OF BLAIR A.
NICHOLAS IN SUPPORT OF THE
MEMORANDUM OF POINTS AND
AUTHORITIES IN FURTHER SUPPORT
OF THE MOTION OF PGGM, OREGON
AND OKLAHOMA FOR APPOINTMENT
AS LEAD PLAINTIFF AND IN
OPPOSITION TO THE COMPETING
MOTIONS**

Date: March 1, 2013
Time: 10:00 a.m.
Room: 6 – 17th Floor
Judge: Charles R. Breyer

(Additional captions on following pages)

DECL. B. NICHOLAS IN SUPPORT OF THE MEMO P&AS IN FURTHER SUPPORT
OF MOT. OF PGGM, OREGON AND OKLAHOMA FOR APP'T AS LP. AND IN OPP.
TO COMPETING MOTS. Case No. CV-12-05980 CRB

1 DAVIN POKOIK, Individually and on
2 Behalf of All Others Similarly Situated,

3 Plaintiff,

4 v.

5 HEWLETT-PACKARD COMPANY,
6 AUTONOMY CORPORATION PLC,
7 DELOITTE LLP, LEO APOTHEKER,
8 MARGARET C. WHITMAN, CATHERINE
A. LESJAK, JAMES T. MURRIN,
MICHAEL R. LYNCH, and SUSHOVAN
HUSSAIN,

9 Defendants.

Case No. CV-12-06074 CRB

10 PAUL NEUMANN,

11 Plaintiff,

12 v.

13 HEWLETT-PACKARD COMPANY,
14 MARGARET C. WHITMAN, LEO
15 APOTHEKER, JAMES T. MURRIN,
CATHERINE A. LESJAK, and MARK
HURD,

16 Defendants.

Case No. CV-13-00284 CRB

I, Blair A. Nicholas, declare as follows:

1. I am a partner with the law firm of Bernstein Litowitz Berger & Grossmann LLP. I submit this Declaration in support of the Memorandum of Points and Authorities in Further Support of the Motion of PGGM Vermogensbeheer B.V. ("PGGM"), the State of Oregon by and through the Oregon State Treasurer on behalf of the Common School Fund and, together with the Oregon Public Employees Retirement Board, on behalf of the Oregon Public Employees Retirement Fund ("Oregon") and Oklahoma Teachers Retirement System ("Oklahoma") and in Opposition to the Competing Motions. I have knowledge of the facts set forth herein and, if required, could and would competently testify thereto.

2. Attached hereto as Exhibit A is a true and correct copy of the Order Appointing The Virginia Retirement System And Her Majesty The Queen In Right Of Alberta As Lead Plaintiff And Approving Their Selection Of Co-Lead Counsel in *Deangelis v. Corzine, et al.*, No. 11-cv-07866-VM, ECF No. 140 (S.D.N.Y. Jan. 20, 2012).

3. Attached hereto as Exhibit B is a true and correct copy of the Order appointing lead plaintiff in *Watkins v. ShoreTel Inc.*, No. 08-cv-00271-CRB, ECF No. 27 (N.D. Cal. Apr. 25, 2008).

4. Attached hereto as Exhibit C is a true and correct copy of the Order Appointing The LE Group As Lead Plaintiff And Appointing Lead Counsel in *In re Leadis Tech., Inc. Sec. Litig.*, No. 05-cv-00882-CRB, ECF No. 19 (N.D. Cal. June 10, 2005).

5. Attached hereto as Exhibit D is a true and correct copy of the Joint Stipulation And Order Of Lead Plaintiff Applicants To Appoint Lead Plaintiffs And To Approve Lead Plaintiffs' Selection Of Lead Counsel, Executive Committee And Liaison in *In re Solectron Corp. Sec. Litig.*, No. 03-cv-00986-CRB, ECF No. 53 (N.D. Cal. June 2, 2003).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of February, 2013.

/s/ Blair A. Nicholas
BLAIR A. NICHOLAS

ADDITIONAL COUNSEL

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by and through the Oregon State Treasurer on behalf of the
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Employees Retirement Fund and Oklahoma Teachers
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State Treasurer on behalf of the Common School Fund
and, together with the Oregon Public Employees Retirement
Board, on behalf of the Oregon Public Employees Retirement Fund*

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 8, 2013.

BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

/s/ Blair A. Nicholas

BLAIR A. NICHOLAS

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